

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

FILED

MAY 14 2019

UNITED STATES OF AMERICA,

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA

V.

CR19 0226 RS

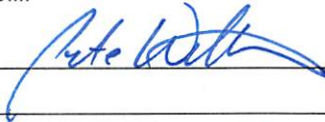
LORENZO LEE,
a/k/a "O.G.," et al.

DEFENDANT(S).

INDICTMENT


VIOLATIONS: 21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (Two Counts); 21 U.S.C. § 841(a)(1) – Distribution of Controlled Substances (Seven Counts); 21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Controlled Substances (Eight Counts); 21 U.S.C. § 856(a)(2) – Maintaining Drug-Involved Premises; 18 U.S.C. § 2 – Aiding and Abetting; 21 U.S.C. § 853 – Forfeiture Allegation

A true bill.



Foreman

Filed in open court this 14 day of

MAY 2019 -


Clerk

Bail, \$ _____



SALLIE KIM
United States Magistrate Judge

NO BAIL ARREST WARRANT

McCoy, Polle,
Martinez-Diaz, Alvarado,
Lopez, Torres-Garcia, Aguilar-
Pacheco

NO PROCESS

L. Lee, Jose Delgado,
Man Delgado,
D. Garthos,
T. Peoples, A. Brown

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED

See attachment

- ☐
- Petty
-
- ☐
- Minor
-
- ☐
- Misdemeanor
-
- ☒
- Felony

PENALTY: See attachment

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

DEFENDANT - U.S.

LORENZO LEE, a/k/a "O.G."

DISTRICT COURT NUMBER

None **CR19 0226****PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

DEA

- ☒
- person is awaiting trial in another Federal or State Court, give name of court

Northern District of California

- ☐
- this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

- ☐
- this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSE
SHOW
DOCKET NO.

- ☐
- this prosecution relates to a pending case involving this same defendant

MAGISTRATE
CASE NO.

- ☒
- prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

3-19-70654

Name and Office of Person

Furnishing Information on this form AUSA Ryan Rezaei

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

Casey Boome/Ryan Rezaei

DEFENDANT**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

- 1)
- ☐
- If not detained give date any prior summons was served on above charges
-
- 2)
- ☐
- Is a Fugitive
-
- 3)
- ☒
- Is on Bail or Release from (show District)

Northern District of California

IS IN CUSTODY

- 4)
- ☐
- On this charge
-
- 5)
- ☐
- On another conviction }
- ☐
- Federal
- ☐
- State
-
- 6)
- ☐
- Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF
ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted
ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☐ SUMMONS ☒ NO PROCESS* ☐ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address:

Date/Time: _____ Before Judge: _____

Comments:

FILED

MAY 14 2019

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA

PENALTY SHEET

The defendants are charged as follows:

1. LORENZO LEE, a/k/a "O.G."

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

2. JEFFREY MCCOY

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 2: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 3: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 5: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 6: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

3. ANTHONY BROWN, a/k/a "Ant Man"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

4. DESHAWNTE GAMBOA

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

5. DEBORAH POLK

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 16: Maintaining Drug-Involved Premises (21 U.S.C. § 856(a)(2))

6. EVAN MARTINEZ-DIAZ

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

7. MAGO AGUILAR-PACHECO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

8. CESAR ALVARADO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 11: Possession with Intent to Distribute Five Kilograms and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 12: Possession with Intent to Distribute 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and

FILED

MAY 14 2019

SUSAN Y. SCONG
CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA

FILED

MAY 14 2019

Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA

9. JESSE LOPEZ, III

Count 8: Possession with Intent to Distribute 400 Grams and More of a Mixture and Substance Containing a Detectable Amount of Fentanyl (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

10. JOSE DELGADILLO, a/k/a "Tepa"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

11. MARCO DELGADILLO, a/k/a "Tonio"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

12. LUIS TORRES-GARCIA, a/k/a "Guero"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

13. TIMOTHY PEOPLES, a/k/a "Tee"

Count 17: Possession with Intent to Distribute 28 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 18: Possession with Intent to Distribute Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Penalties associated with Counts 8, 10, 11, and 13 are as follows (A-weight drugs):

1. Imprisonment: Not less than 10 years but up to life
2. Fine: \$10 million
3. Supervised Release: Not less than 5 years but up to life
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

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CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA

Penalties associated with Counts 2, 6, 7, 9, 12, 14, 15, and 17 are as follows (B-weight drugs):

1. Imprisonment: Not less than 5 years and not more than 40 years
2. Fine: \$5 million
3. Supervised Release: Not less than 4 years but up to life
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

Penalties associated with Counts 3, 4, 5, and 18 are as follows (C-weight drugs):

1. Imprisonment: Not more than 20 years
2. Fine: \$1 million
3. Supervised Release: Not less than 3 years but up to life
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

Penalties associated with Count 16 (Maintaining Drug-Involved Premises)

1. Imprisonment: Not more than 20 years
2. Fine: \$500,000
3. Supervised Release: Not more than 3 years
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

Penalties associated with Count 1 for Various Defendants (Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances) (Various Weights)

1. LORENZO LEE, a/k/a "O.G.," EVAN MARTINEZ-DIAZ, MAGO AGUILAR-PACHECO, CESAR ALVARADO – same as those pertaining to Counts 8, 10, 11, and 13
2. JEFFREY MCCOY, ANTHONY BROWN, a/k/a "Ant Man," DESHAWNTE GAMBOA, DEBORAH POLK – same as those pertaining to Counts 2, 6, 7, 9, 12, 14, 15, and 17
3. JOSE DELGADILLO, a/k/a "Tepa" – same as those pertaining to Counts 3, 4, 5, and 18

FILED
MAY 14 2019
SUSAN Y. GOONG
CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED

See attachment

- ☐
- Petty
-
- ☐
- Minor
-
- ☐
- Misdemeanor
-
- ☒
- Felony

PENALTY: See attachment

Name of District Court, and/or Judge/Magistrate Location

 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION
DEFENDANT - U.S.

JEFFREY MCCOY

DISTRICT COURT NUMBER

None

CR19**0226****DEFENDANT****IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

- 1)
- ☒
- If not detained give date any prior summons was served on above charges

- 2)
- ☐
- Is a Fugitive

- 3)
- ☐
- Is on Bail or Release from (show District)

Northern District of California

IS IN CUSTODY

- 4)
- ☐
- On this charge

- 5)
- ☐
- On another conviction

☐ Federal ☐ State

- 6)
- ☐
- Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

DEA

- ☐
- person is awaiting trial in another Federal or State Court, give name of court

- ☐
- this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

- ☐
- this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSE

SHOW DOCKET NO.

- ☐
- this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

- ☒
- prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

3-19-70649

Name and Office of Person

Furnishing Information on this form AUSA Ryan Rezaei

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

Casey Boome/Ryan Rezaei

ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☐ SUMMONS ☒ NO PROCESS* ☐ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

PENALTY SHEET

RS

The defendants are charged as follows:

CR19-0226

1. LORENZO LEE, a/k/a "O.G."

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Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

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Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

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Count 11: Possession with Intent to Distribute Five Kilograms and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 12: Possession with Intent to Distribute 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

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Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and

Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

9. JESSE LOPEZ, III

Count 8: Possession with Intent to Distribute 400 Grams and More of a Mixture and Substance Containing a Detectable Amount of Fentanyl (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

CR19 0226rs

10. JOSE DELGADILLO, a/k/a "Tepa"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

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12. LUIS TORRES-GARCIA, a/k/a "Guero"

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Count 17: Possession with Intent to Distribute 28 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 18: Possession with Intent to Distribute Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Penalties associated with Counts 8, 10, 11, and 13 are as follows (A-weight drugs):

1. Imprisonment: Not less than 10 years but up to life
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3. Supervised Release: Not less than 5 years but up to life
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5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

CR19-0226

Penalties associated with Counts 2, 6, 7, 9, 12, 14, 15, and 17 are as follows (B-weight drugs):

1. Imprisonment: Not less than 5 years and not more than 40 years
2. Fine: \$5 million
3. Supervised Release: Not less than 4 years but up to life
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

RS

Penalties associated with Counts 3, 4, 5, and 18 are as follows (C-weight drugs):

1. Imprisonment: Not more than 20 years
2. Fine: \$1 million
3. Supervised Release: Not less than 3 years but up to life
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5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

Penalties associated with Count 16 (Maintaining Drug-Involved Premises)

1. Imprisonment: Not more than 20 years
2. Fine: \$500,000
3. Supervised Release: Not more than 3 years
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

Penalties associated with Count 1 for Various Defendants (Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances) (Various Weights)

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3. JOSE DELGADILLO, a/k/a "Tepa" – same as those pertaining to Counts 3, 4, 5, and 18

RS

CR19

0226

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED

See attachment

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PENALTY: See attachment

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

DEFENDANT - U.S.

▶ ANTHONY BROWN, a/k/a "Ant Man"

DISTRICT COURT NUMBER

None

CR19 0226**DEFENDANT****IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

1) ☐ If not detained give date any prior summons was served on above charges ▶2) ☐ Is a Fugitive3) ☒ Is on Bail or Release from (show District)

Northern District of California

IS IN CUSTODY4) ☐ On this charge5) ☐ On another conviction☐ Federal ☐ State6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST ▶

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY ▶

Month/Day/Year

☐ This report amends AO 257 previously submitted**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

DEA

☒ person is awaiting trial in another Federal or State Court, give name of court

Northern District of California

☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. ATTORNEY ☐ DEFENSE

SHOW DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

☒ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

3-19-70652

Name and Office of Person

Furnishing Information on this form AUSA Ryan Rezaei

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

Casey Boome/Ryan Rezaei

ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**☐ SUMMONS ☒ NO PROCESS* ☐ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

PENALTY SHEET

The defendants are charged as follows:

CR19

0226

RS

1. LORENZO LEE, a/k/a "O.G."

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

2. JEFFREY MCCOY

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 2: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 3: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 5: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 6: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

3. ANTHONY BROWN, a/k/a "Ant Man"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

4. DESHAWNTE GAMBOA

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

5. DEBORAH POLK

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 16: Maintaining Drug-Involved Premises (21 U.S.C. § 856(a)(2))

6. EVAN MARTINEZ-DIAZ

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

7. MAGO AGUILAR-PACHECO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

8. CESAR ALVARADO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 11: Possession with Intent to Distribute Five Kilograms and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 12: Possession with Intent to Distribute 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and

CR19 0226 RS

Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

9. JESSE LOPEZ, III

Count 8: Possession with Intent to Distribute 400 Grams and More of a Mixture and Substance Containing a Detectable Amount of Fentanyl (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

RS

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10. JOSE DELGADILLO, a/k/a "Tepa"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

11. MARCO DELGADILLO, a/k/a "Tonio"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

12. LUIS TORRES-GARCIA, a/k/a "Guero"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

13. TIMOTHY PEOPLES, a/k/a "Tee"

Count 17: Possession with Intent to Distribute 28 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 18: Possession with Intent to Distribute Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Penalties associated with Counts 8, 10, 11, and 13 are as follows (A-weight drugs):

1. Imprisonment: Not less than 10 years but up to life
2. Fine: \$10 million
3. Supervised Release: Not less than 5 years but up to life
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

Penalties associated with Counts 2, 6, 7, 9, 12, 14, 15, and 17 are as follows (B-weight drugs):

1. Imprisonment: Not less than 5 years and not more than 40 years
2. Fine: \$5 million
3. Supervised Release: Not less than 4 years but up to life
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

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RS

Penalties associated with Counts 3, 4, 5, and 18 are as follows (C-weight drugs):

1. Imprisonment: Not more than 20 years
2. Fine: \$1 million
3. Supervised Release: Not less than 3 years but up to life
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

Penalties associated with Count 16 (Maintaining Drug-Involved Premises)

1. Imprisonment: Not more than 20 years
2. Fine: \$500,000
3. Supervised Release: Not more than 3 years
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

Penalties associated with Count 1 for Various Defendants (Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances) (Various Weights)

1. LORENZO LEE, a/k/a "O.G.," EVAN MARTINEZ-DIAZ, MAGO AGUILAR-PACHECO, CESAR ALVARADO – same as those pertaining to Counts 8, 10, 11, and 13
2. JEFFREY MCCOY, ANTHONY BROWN, a/k/a "Ant Man," DESHAWNTE GAMBOA, DEBORAH POLK – same as those pertaining to Counts 2, 6, 7, 9, 12, 14, 15, and 17
3. JOSE DELGADILLO, a/k/a "Tepa" – same as those pertaining to Counts 3, 4, 5, and 18

RS

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AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED

See attachment

- ☐
- Petty
-
- ☐
- Minor
-
- ☐
- Misdemeanor
-
- ☒
- Felony

PENALTY: See attachment

Name of District Court, and for Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

DEFENDANT - U.S.

DESHAWNTE GAMBOA

DISTRICT COURT NUMBER

None

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT

NORTH DISTRICT OF CALIFORNIA

RS

CR19

0226

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

DEA

☒ person is awaiting trial in another Federal or State Court, give name of court

Northern District of California

☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSE
SHOW
DOCKET NO.
☐ this prosecution relates to a pending case involving this same defendant
MAGISTRATE
CASE NO.
☒ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

3-19-70647

Name and Office of Person

Furnishing Information on this form AUSA Ryan Rezaei

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

Casey Boome/Ryan Rezaei

DEFENDANT**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

 1) ☐ If not detained give date any prior summons was served on above charges
2) ☐ Is a Fugitive3) ☒ Is on Bail or Release from (show District)

Northern District of California

IS IN CUSTODY4) ☐ On this charge5) ☐ On another conviction
☐ Federal ☐ State
6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF
ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted
ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☐ SUMMONS ☒ NO PROCESS* ☐ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

PENALTY SHEET

The defendants are charged as follows:

CR19

0226

RS

1. LORENZO LEE, a/k/a "O.G."

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Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

2. JEFFREY MCCOY

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

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Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

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Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

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4. DESHAWNTE GAMBOA

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

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RS

5. DEBORAH POLK

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 16: Maintaining Drug-Involved Premises (21 U.S.C. § 856(a)(2))

6. EVAN MARTINEZ-DIAZ

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

7. MAGO AGUILAR-PACHECO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

8. CESAR ALVARADO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 11: Possession with Intent to Distribute Five Kilograms and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

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9. JESSE LOPEZ, III

Count 8: Possession with Intent to Distribute 400 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

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RS

10. JOSE DELGADILLO, a/k/a "Tepa"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

11. MARCO DELGADILLO, a/k/a "Tonio"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

12. LUIS TORRES-GARCIA, a/k/a "Guero"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

13. TIMOTHY PEOPLES, a/k/a "Tee"

Count 17: Possession with Intent to Distribute 28 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 18: Possession with Intent to Distribute Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Penalties associated with Counts 8, 10, 11, and 13 are as follows (A-weight drugs):

1. Imprisonment: Not less than 10 years but up to life
2. Fine: \$10 million
3. Supervised Release: Not less than 5 years but up to life
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

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RS

Penalties associated with Counts 2, 6, 7, 9, 12, 14, 15, and 17 are as follows (B-weight drugs):

1. Imprisonment: Not less than 5 years and not more than 40 years
2. Fine: \$5 million
3. Supervised Release: Not less than 4 years but up to life
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

Penalties associated with Counts 3, 4, 5, and 18 are as follows (C-weight drugs):

1. Imprisonment: Not more than 20 years
2. Fine: \$1 million
3. Supervised Release: Not less than 3 years but up to life
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

Penalties associated with Count 16 (Maintaining Drug-Involved Premises)

1. Imprisonment: Not more than 20 years
2. Fine: \$500,000
3. Supervised Release: Not more than 3 years
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

Penalties associated with Count 1 for Various Defendants (Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances) (Various Weights)

1. LORENZO LEE, a/k/a "O.G.," EVAN MARTINEZ-DIAZ, MAGO AGUILAR-PACHECO, CESAR ALVARADO – same as those pertaining to Counts 8, 10, 11, and 13
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RS

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AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED

See attachment

- ☐
- Petty
-
- ☐
- Minor
-
- ☐
- Misdemeanor
-
- ☒
- Felony

PENALTY: See attachment

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

DEFENDANT - U.S.

DEBORAH POLK

DISTRICT COURT NUMBER
None
 SUSAN Y. SOONG
 CLERK, U.S. DISTRICT COURT
 NORTH DISTRICT OF CALIFORNIA

CR19 0226

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

DEA

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSE
SHOW
DOCKET NO.
☐ this prosecution relates to a pending case involving this same defendant
MAGISTRATE
CASE NO.
☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

 Name and Office of Person
 Furnishing Information on this form AUSA Ryan Rezaei

☒ U.S. Attorney ☐ Other U.S. Agency

 Name of Assistant U.S.
 Attorney (if assigned) Casey Boome/Ryan Rezaei
DEFENDANT**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

 1) ☒ If not detained give date any prior summons was served on above charges

 2) ☐ Is a Fugitive

 3) ☐ Is on Bail or Release from (show District)
IS IN CUSTODY
 4) ☐ On this charge

 5) ☐ On another conviction

☐ Federal ☐ State

 6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF
ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

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TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted
ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

Bail Amount: _____

If Summons, complete following:

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Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

PENALTY SHEET

The defendants are charged as follows:

CR19 0226

RS

1. LORENZO LEE, a/k/a "O.G."

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Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

2. JEFFREY MCCOY

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 2: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

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Count 5: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 6: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

3. ANTHONY BROWN, a/k/a "Ant Man"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

4. DESHAWNTE GAMBOA

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

RS

5. DEBORAH POLK

CR19 0226

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 16: Maintaining Drug-Involved Premises (21 U.S.C. § 856(a)(2))

6. EVAN MARTINEZ-DIAZ

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

7. MAGO AGUILAR-PACHECO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

8. CESAR ALVARADO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 11: Possession with Intent to Distribute Five Kilograms and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 12: Possession with Intent to Distribute 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and

Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

9. JESSE LOPEZ, III

Count 8: Possession with Intent to Distribute 400 Grams and More of a Mixture and Substance Containing a Detectable Amount of Fentanyl (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

CR19 0226

RS

10. JOSE DELGADILLO, a/k/a "Tepa"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

11. MARCO DELGADILLO, a/k/a "Tonio"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

12. LUIS TORRES-GARCIA, a/k/a "Guero"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

13. TIMOTHY PEOPLES, a/k/a "Tee"

Count 17: Possession with Intent to Distribute 28 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 18: Possession with Intent to Distribute Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Penalties associated with Counts 8, 10, 11, and 13 are as follows (A-weight drugs):

1. Imprisonment: Not less than 10 years but up to life
2. Fine: \$10 million
3. Supervised Release: Not less than 5 years but up to life
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

RS

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Penalties associated with Counts 2, 6, 7, 9, 12, 14, 15, and 17 are as follows (B-weight drugs):

1. Imprisonment: Not less than 5 years and not more than 40 years
2. Fine: \$5 million
3. Supervised Release: Not less than 4 years but up to life
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

Penalties associated with Counts 3, 4, 5, and 18 are as follows (C-weight drugs):

1. Imprisonment: Not more than 20 years
2. Fine: \$1 million
3. Supervised Release: Not less than 3 years but up to life
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

Penalties associated with Count 16 (Maintaining Drug-Involved Premises)

1. Imprisonment: Not more than 20 years
2. Fine: \$500,000
3. Supervised Release: Not more than 3 years
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

Penalties associated with Count 1 for Various Defendants (Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances) (Various Weights)

1. LORENZO LEE, a/k/a "O.G.," EVAN MARTINEZ-DIAZ, MAGO AGUILAR-PACHECO, CESAR ALVARADO – same as those pertaining to Counts 8, 10, 11, and 13
2. JEFFREY MCCOY, ANTHONY BROWN, a/k/a "Ant Man," DESHAWNTE GAMBOA, DEBORAH POLK – same as those pertaining to Counts 2, 6, 7, 9, 12, 14, 15, and 17
3. JOSE DELGADILLO, a/k/a "Tepa" – same as those pertaining to Counts 3, 4, 5, and 18

RS

CR19 0226

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURTBY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING**OFFENSE CHARGED**

See attachment

- ☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: See attachment

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**DEFENDANT - U.S.**

▶ EVAN MARTINEZ-DIAZ

DISTRICT COURT NUMBER

None

CR19-0226FILED
MAY 14 2019
SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA**RS****PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

DEA

☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. ATTORNEY ☐ DEFENSESHOW
DOCKET NO.☐ this prosecution relates to a pending case involving this same defendantMAGISTRATE
CASE NO.☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

} 3:19-70650

Name and Office of Person

Furnishing Information on this form AUSA Ryan Rezaei

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

Casey Boome/Ryan Rezaei

DEFENDANT**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

1) ☒ If not detained give date any prior summons was served on above charges ▶2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)**IS IN CUSTODY**4) ☐ On this charge5) ☐ On another conviction☐ Federal ☐ State6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST ▶

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY ▶

Month/Day/Year

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

PENALTY SHEET

The defendants are charged as follows:

1. LORENZO LEE, a/k/a "O.G."

CR19

0226

RS

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

2. JEFFREY MCCOY

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 2: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 3: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 5: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 6: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

3. ANTHONY BROWN, a/k/a "Ant Man"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

4. DESHAWNTE GAMBOA

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

CR19 0226

5. DEBORAH POLK

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B)) **RS**

Count 16: Maintaining Drug-Involved Premises (21 U.S.C. § 856(a)(2))

6. EVAN MARTINEZ-DIAZ

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

7. MAGO AGUILAR-PACHECO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

8. CESAR ALVARADO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 11: Possession with Intent to Distribute Five Kilograms and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 12: Possession with Intent to Distribute 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and

Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

9. JESSE LOPEZ, III

Count 8: Possession with Intent to Distribute 400 Grams and More of a Mixture and Substance Containing a Detectable Amount of Fentanyl (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

CR19 0226
RS

10. JOSE DELGADILLO, a/k/a "Tepa"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

11. MARCO DELGADILLO, a/k/a "Tonio"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

12. LUIS TORRES-GARCIA, a/k/a "Guero"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

13. TIMOTHY PEOPLES, a/k/a "Tee"

Count 17: Possession with Intent to Distribute 28 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 18: Possession with Intent to Distribute Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Penalties associated with Counts 8, 10, 11, and 13 are as follows (A-weight drugs):

1. Imprisonment: Not less than 10 years but up to life
2. Fine: \$10 million
3. Supervised Release: Not less than 5 years but up to life
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

CR19 0226 RS

Penalties associated with Counts 2, 6, 7, 9, 12, 14, 15, and 17 are as follows (B-weight drugs):

1. Imprisonment: Not less than 5 years and not more than 40 years
2. Fine: \$5 million
3. Supervised Release: Not less than 4 years but up to life
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

Penalties associated with Counts 3, 4, 5, and 18 are as follows (C-weight drugs):

1. Imprisonment: Not more than 20 years
2. Fine: \$1 million
3. Supervised Release: Not less than 3 years but up to life
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

Penalties associated with Count 16 (Maintaining Drug-Involved Premises)

1. Imprisonment: Not more than 20 years
2. Fine: \$500,000
3. Supervised Release: Not more than 3 years
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

Penalties associated with Count 1 for Various Defendants (Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances) (Various Weights)

1. LORENZO LEE, a/k/a "O.G.," EVAN MARTINEZ-DIAZ, MAGO AGUILAR-PACHECO, CESAR ALVARADO – same as those pertaining to Counts 8, 10, 11, and 13
2. JEFFREY MCCOY, ANTHONY BROWN, a/k/a "Ant Man," DESHAWNTE GAMBOA, DEBORAH POLK – same as those pertaining to Counts 2, 6, 7, 9, 12, 14, 15, and 17
3. JOSE DELGADILLO, a/k/a "Tepa" – same as those pertaining to Counts 3, 4, 5, and 18 **RS**

CR19 0226

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURTBY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING**OFFENSE CHARGED**

See attachment

- ☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: See attachment

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

DEFENDANT - U.S.

MAGO AGUILAR-PACHECO

DISTRICT COURT NUMBER

None

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

DEA

- ☐ person is awaiting trial in another Federal or State Court, give name of court

- ☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

- ☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSESHOW
DOCKET NO.

- ☐ this prosecution relates to a pending case involving this same defendant

MAGISTRATE
CASE NO.

- ☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

- 1) ☒ If not detained give date any prior summons was served on above charges

- 2) ☐ Is a Fugitive

- 3) ☐ Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) ☐ On this charge

- 5) ☐ On another conviction

☐ Federal ☐ State

- 6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF
ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY

Month/Day/Year

Name and Office of Person

Furnishing Information on this form AUSA Ryan Rezaei

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

Casey Boome/Ryan Rezaei

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**

- ☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

Bail Amount: _____

If Summons, complete following:

- ☐ Arraignment ☐ Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

PENALTY SHEET

RS

The defendants are charged as follows:

1. LORENZO LEE, a/k/a "O.G."

CR19 0226
Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

2. JEFFREY MCCOY

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 2: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 3: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 5: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 6: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

3. ANTHONY BROWN, a/k/a "Ant Man"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

4. DESHAWNTE GAMBOA

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

CR19 0226

5. DEBORAH POLK

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 16: Maintaining Drug-Involved Premises (21 U.S.C. § 856(a)(2))

6. EVAN MARTINEZ-DIAZ

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

7. MAGO AGUILAR-PACHECO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

8. CESAR ALVARADO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 11: Possession with Intent to Distribute Five Kilograms and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 12: Possession with Intent to Distribute 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and

Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

9. JESSE LOPEZ, III

Count 8: Possession with Intent to Distribute 400 Grams and More of a Mixture and Substance Containing a Detectable Amount of Fentanyl (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

10. JOSE DELGADILLO, a/k/a "Tep

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

11. MARCO DELGADILLO, a/k/a "Tonio"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

12. LUIS TORRES-GARCIA, a/k/a "Guero"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

13. TIMOTHY PEOPLES, a/k/a "Tee"

Count 17: Possession with Intent to Distribute 28 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 18: Possession with Intent to Distribute Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

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Penalties associated with Counts 8, 10, 11, and 13 are as follows (A-weight drugs):

1. Imprisonment: Not less than 10 years but up to life
2. Fine: \$10 million
3. Supervised Release: Not less than 5 years but up to life
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

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0226

Penalties associated with Counts 2, 6, 7, 9, 12, 14, 15, and 17 are as follows (B-weight drugs):

1. Imprisonment: Not less than 5 years and not more than 40 years
2. Fine: \$5 million
3. Supervised Release: Not less than 4 years but up to life
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

RS

Penalties associated with Counts 3, 4, 5, and 18 are as follows (C-weight drugs):

1. Imprisonment: Not more than 20 years
2. Fine: \$1 million
3. Supervised Release: Not less than 3 years but up to life
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

Penalties associated with Count 16 (Maintaining Drug-Involved Premises)

1. Imprisonment: Not more than 20 years
2. Fine: \$500,000
3. Supervised Release: Not more than 3 years
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

Penalties associated with Count 1 for Various Defendants (Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances) (Various Weights)

1. LORENZO LEE, a/k/a "O.G.," EVAN MARTINEZ-DIAZ, MAGO AGUILAR-PACHECO, CESAR ALVARADO – same as those pertaining to Counts 8, 10, 11, and 13
2. JEFFREY MCCOY, ANTHONY BROWN, a/k/a "Ant Man," DESHAWNTE GAMBOA, DEBORAH POLK – same as those pertaining to Counts 2, 6, 7, 9, 12, 14, 15, and 17
3. JOSE DELGADILLO, a/k/a "Tepa" – same as those pertaining to Counts 3, 4, 5, and 17

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AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURTBY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING**OFFENSE CHARGED**

See attachment

- ☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: See attachment

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

DEFENDANT - U.S.

CESAR ALVARADO

DISTRICT COURT NUMBER

None

CR19**0226****PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

DEA

☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSESHOW
DOCKET NO.

☐ this prosecution relates to a pending case involving this same defendant

MAGISTRATE
CASE NO.

☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person

Furnishing Information on this form AUSA Ryan Rezaei

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

Casey Boome/Ryan Rezaei

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

1) ☒ If not detained give date any prior summons was served on above charges2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)**IS IN CUSTODY**4) ☐ On this charge5) ☐ On another conviction☐ Federal ☐ State6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF
ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

PENALTY SHEET

The defendants are charged as follows:

CR19-0226

1. LORENZO LEE, a/k/a "O.G."

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

2. JEFFREY MCCOY

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 2: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 3: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 5: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 6: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

3. ANTHONY BROWN, a/k/a "Ant Man"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

4. DESHAWNTE GAMBOA

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

5. DEBORAH POLK

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 16: Maintaining Drug-Involved Premises (21 U.S.C. § 856(a)(2))

6. EVAN MARTINEZ-DIAZ

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

7. MAGO AGUILAR-PACHECO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

8. CESAR ALVARADO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 11: Possession with Intent to Distribute Five Kilograms and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 12: Possession with Intent to Distribute 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and

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Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

9. JESSE LOPEZ, III

Count 8: Possession with Intent to Distribute 400 Grams and More of a Mixture and Substance Containing a Detectable Amount of Fentanyl (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

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10. JOSE DELGADILLO, a/k/a "Tepa"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

11. MARCO DELGADILLO, a/k/a "Tonio"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

12. LUIS TORRES-GARCIA, a/k/a "Guero"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

13. TIMOTHY PEOPLES, a/k/a "Tee"

Count 17: Possession with Intent to Distribute 28 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 18: Possession with Intent to Distribute Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Penalties associated with Counts 8, 10, 11, and 13 are as follows (A-weight drugs):

1. Imprisonment: Not less than 10 years but up to life
2. Fine: \$10 million
3. Supervised Release: Not less than 5 years but up to life
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

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Penalties associated with Counts 2, 6, 7, 9, 12, 14, 15, and 17 are as follows (B-weight drugs):

1. Imprisonment: Not less than 5 years and not more than 40 years
2. Fine: \$5 million
3. Supervised Release: Not less than 4 years but up to life
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

RS

Penalties associated with Counts 3, 4, 5, and 18 are as follows (C-weight drugs):

1. Imprisonment: Not more than 20 years
2. Fine: \$1 million
3. Supervised Release: Not less than 3 years but up to life
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

Penalties associated with Count 16 (Maintaining Drug-Involved Premises)

1. Imprisonment: Not more than 20 years
2. Fine: \$500,000
3. Supervised Release: Not more than 3 years
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

Penalties associated with Count 1 for Various Defendants (Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances) (Various Weights)

1. LORENZO LEE, a/k/a "O.G.," EVAN MARTINEZ-DIAZ, MAGO AGUILAR-PACHECO, CESAR ALVARADO – same as those pertaining to Counts 8, 10, 11, and 13
2. JEFFREY MCCOY, ANTHONY BROWN, a/k/a "Ant Man," DESHAWNTE GAMBOA, DEBORAH POLK – same as those pertaining to Counts 9, 12, 14, 15, and 17
3. JOSE DELGADILLO, a/k/a "Tepa" – same as those pertaining to Counts 3, 4, 5, and 18

RS

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURTBY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING**OFFENSE CHARGED**

See attachment

- ☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: See attachment

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

DEFENDANT - U.S.

JESSE LOPEZ, III

DISTRICT COURT NUMBER

None

DEFENDANT

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

DEA

☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. ATTORNEY ☐ DEFENSESHOW
DOCKET NO.☐ this prosecution relates to a pending case involving this same defendantMAGISTRATE
CASE NO.☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person

Furnishing Information on this form AUSA Ryan Rezaei

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

Casey Boome/Ryan Rezaei

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

1) ☒ If not detained give date any prior summons was served on above charges2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)**IS IN CUSTODY**4) ☐ On this charge5) ☐ On another conviction☐ Federal ☐ State6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF
ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

PENALTY SHEET

The defendants are charged as follows:

1. LORENZO LEE, a/k/a "O.G."

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Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

2. JEFFREY MCCOY

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 2: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 3: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 5: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 6: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

3. ANTHONY BROWN, a/k/a "Ant Man"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

4. DESHAWNTE GAMBOA

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

5. DEBORAH POLK

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RS

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 16: Maintaining Drug-Involved Premises (21 U.S.C. § 856(a)(2))

6. EVAN MARTINEZ-DIAZ

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

7. MAGO AGUILAR-PACHECO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

8. CESAR ALVARADO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 11: Possession with Intent to Distribute Five Kilograms and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 12: Possession with Intent to Distribute 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and

Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

9. JESSE LOPEZ, III

Count 8: Possession with Intent to Distribute 400 Grams and More of a Mixture and Substance Containing a Detectable Amount of Fentanyl (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

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10. JOSE DELGADILLO, a/k/a "Tepa"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

11. MARCO DELGADILLO, a/k/a "Tonio"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

12. LUIS TORRES-GARCIA, a/k/a "Guero"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

13. TIMOTHY PEOPLES, a/k/a "Tee"

Count 17: Possession with Intent to Distribute 28 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 18: Possession with Intent to Distribute Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Penalties associated with Counts 8, 10, 11, and 13 are as follows (A-weight drugs):

1. Imprisonment: Not less than 10 years but up to life
2. Fine: \$10 million
3. Supervised Release: Not less than 5 years but up to life
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

CR19-0226

Penalties associated with Counts 2, 6, 7, 9, 12, 14, 15, and 17 are as follows (B-weight drugs)

1. Imprisonment: Not less than 5 years and not more than 40 years
2. Fine: \$5 million
3. Supervised Release: Not less than 4 years but up to life
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

Penalties associated with Counts 3, 4, 5, and 18 are as follows (C-weight drugs):

1. Imprisonment: Not more than 20 years
2. Fine: \$1 million
3. Supervised Release: Not less than 3 years but up to life
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

Penalties associated with Count 16 (Maintaining Drug-Involved Premises)

1. Imprisonment: Not more than 20 years
2. Fine: \$500,000
3. Supervised Release: Not more than 3 years
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

Penalties associated with Count 1 for Various Defendants (Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances) (Various Weights)

1. LORENZO LEE, a/k/a "O.G.," EVAN MARTINEZ-DIAZ, MAGO AGUILAR-PACHECO, CESAR ALVARADO – same as those pertaining to Counts 8, 10, 11, and 13
2. JEFFREY MCCOY, ANTHONY BROWN, a/k/a "Ant Man," DESHAWNTE GAMBOA, DEBORAH POLK – same as those pertaining to Counts 2, 6, 7, 9, 12, 14, 15, and 17
3. JOSE DELGADILLO, a/k/a "Tepa" – same as those pertaining to Counts 3, 4, 5, and 18

RS

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AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED

See attachment

- ☐
- Petty
-
- ☐
- Minor
-
- ☐
- Misdemeanor
-
- ☒
- Felony

PENALTY: See attachment

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

DEFENDANT - U.S.

JOSE DELGADILLO, a/k/a "Tepa"

DISTRICT COURT NUMBER

None

CR19**0226****PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

DEA

- ☒
- person is awaiting trial in another Federal or State Court, give name of court

Northern District of California

- ☐
- this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

- ☐
- this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSE
SHOW
DOCKET NO.

- ☐
- this prosecution relates to a pending case involving this same defendant

MAGISTRATE
CASE NO.

- ☒
- prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

3-19-70655

Name and Office of Person

Furnishing Information on this form AUSA Ryan Rezaei

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

Casey Boome/Ryan Rezaei

DEFENDANT**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

- 1)
- ☐
- If not detained give date any prior summons was served on above charges

- 2)
- ☐
- Is a Fugitive

- 3)
- ☒
- Is on Bail or Release from (show District)

Northern District of California

IS IN CUSTODY

- 4)
- ☐
- On this charge

- 5)
- ☐
- On another conviction

☐ Federal ☐ State

- 6)
- ☐
- Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF
ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted
ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☐ SUMMONS ☒ NO PROCESS* ☐ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

PENALTY SHEET

The defendants are charged as follows:

1. LORENZO LEE, a/k/a "O.G."

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

2. JEFFREY MCCOY

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 2: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 3: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 5: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 6: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

3. ANTHONY BROWN, a/k/a "Ant Man"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

CR19 0226
RS

4. DESHAWNTE GAMBOA

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

5. DEBORAH POLK

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 16: Maintaining Drug-Involved Premises (21 U.S.C. § 856(a)(2))

RS

CR19 0226

6. EVAN MARTINEZ-DIAZ

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

7. MAGO AGUILAR-PACHECO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

8. CESAR ALVARADO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 11: Possession with Intent to Distribute Five Kilograms and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 12: Possession with Intent to Distribute 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and

Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

9. JESSE LOPEZ, III

Count 8: Possession with Intent to Distribute 400 Grams and More of a Mixture and Substance Containing a Detectable Amount of Fentanyl (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

CR19 0226 RS

10. JOSE DELGADILLO, a/k/a "Tepa"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

11. MARCO DELGADILLO, a/k/a "Tonio"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

12. LUIS TORRES-GARCIA, a/k/a "Guero"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

13. TIMOTHY PEOPLES, a/k/a "Tee"

Count 17: Possession with Intent to Distribute 28 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 18: Possession with Intent to Distribute Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Penalties associated with Counts 8, 10, 11, and 13 are as follows (A-weight drugs):

1. Imprisonment: Not less than 10 years but up to life
2. Fine: \$10 million
3. Supervised Release: Not less than 5 years but up to life
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

CR19 0226

RS

Penalties associated with Counts 2, 6, 7, 9, 12, 14, 15, and 17 are as follows (B-weight drugs):

1. Imprisonment: Not less than 5 years and not more than 40 years
2. Fine: \$5 million
3. Supervised Release: Not less than 4 years but up to life
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

Penalties associated with Counts 3, 4, 5, and 18 are as follows (C-weight drugs):

1. Imprisonment: Not more than 20 years
2. Fine: \$1 million
3. Supervised Release: Not less than 3 years but up to life
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

Penalties associated with Count 16 (Maintaining Drug-Involved Premises)

1. Imprisonment: Not more than 20 years
2. Fine: \$500,000
3. Supervised Release: Not more than 3 years
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

Penalties associated with Count 1 for Various Defendants (Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances) (Various Weights)

1. LORENZO LEE, a/k/a "O.G.," EVAN MARTINEZ-DIAZ, MAGO AGUILAR-PACHECO, CESAR ALVARADO – same as those pertaining to Counts 8, 10, 11, and 13
2. JEFFREY MCCOY, ANTHONY BROWN, a/k/a "Ant Man," DESHAWNTE GAMBOA, DEBORAH POLK – same as those pertaining to Counts 2, 6, 7, 9, 12, 14, 15, and 17
3. JOSE DELGADILLO, a/k/a "Tepa" – same as those pertaining to Counts 3, 4, 5, and 18

CR19 0226 **RS**

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED

See attachment

- ☐
- Petty
-
- ☐
- Minor
-
- ☐
- Misdemeanor
-
- ☒
- Felony

PENALTY: See attachment

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA**DEFENDANT - U.S.**

MARCO DELGADILLO, a/k/a "Tonio"

DISTRICT COURT NUMBER
None **CR19 0226****PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

DEA

- ☒
- person is awaiting trial in another Federal or State Court, give name of court

Northern District of California

- ☐
- this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

- ☐
- this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSESHOW
DOCKET NO.

- ☐
- this prosecution relates to a pending case involving this same defendant

MAGISTRATE
CASE NO.

- ☒
- prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

3-19-70645

Name and Office of Person

Furnishing Information on this form AUSA Ryan Rezaei

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

Casey Boome/Ryan Rezaei

DEFENDANT**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

- 1)
- ☐
- If not detained give date any prior summons was served on above charges

- 2)
- ☐
- Is a Fugitive

- 3)
- ☒
- Is on Bail or Release from (show District)

Northern District of California

IS IN CUSTODY

- 4)
- ☐
- On this charge

- 5)
- ☐
- On another conviction

☐ Federal ☐ State

- 6)
- ☐
- Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF
ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☒ NO PROCESS* ☐ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

PENALTY SHEET

The defendants are charged as follows:

RS

1. LORENZO LEE, a/k/a "O.G."

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

2. JEFFREY MCCOY

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 2: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 3: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 5: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 6: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

3. ANTHONY BROWN, a/k/a "Ant Man"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

4. DESHAWNTE GAMBOA

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

CR19 0226_{RS}

5. DEBORAH POLK

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 16: Maintaining Drug-Involved Premises (21 U.S.C. § 856(a)(2))

6. EVAN MARTINEZ-DIAZ

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

7. MAGO AGUILAR-PACHECO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

8. CESAR ALVARADO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 11: Possession with Intent to Distribute Five Kilograms and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 12: Possession with Intent to Distribute 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and

Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

9. JESSE LOPEZ, III

Count 8: Possession with Intent to Distribute 400 Grams and More of a Mixture and Substance Containing a Detectable Amount of Fentanyl (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

CR19 0226

10. JOSE DELGADILLO, a/k/a "Tepa"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

11. MARCO DELGADILLO, a/k/a "Tonio"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

12. LUIS TORRES-GARCIA, a/k/a "Guero"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

13. TIMOTHY PEOPLES, a/k/a "Tee"

Count 17: Possession with Intent to Distribute 28 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 18: Possession with Intent to Distribute Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Penalties associated with Counts 8, 10, 11, and 13 are as follows (A-weight drugs):

1. Imprisonment: Not less than 10 years but up to life
2. Fine: \$10 million
3. Supervised Release: Not less than 5 years but up to life
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

CR19

0226

Penalties associated with Counts 2, 6, 7, 9, 12, 14, 15, and 17 are as follows (B-weight drugs):

1. Imprisonment: Not less than 5 years and not more than 40 years
2. Fine: \$5 million
3. Supervised Release: Not less than 4 years but up to life
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

RS

Penalties associated with Counts 3, 4, 5, and 18 are as follows (C-weight drugs):

1. Imprisonment: Not more than 20 years
2. Fine: \$1 million
3. Supervised Release: Not less than 3 years but up to life
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

Penalties associated with Count 16 (Maintaining Drug-Involved Premises)

1. Imprisonment: Not more than 20 years
2. Fine: \$500,000
3. Supervised Release: Not more than 3 years
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

Penalties associated with Count 1 for Various Defendants (Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances) (Various Weights)

1. LORENZO LEE, a/k/a "O.G.," EVAN MARTINEZ-DIAZ, MAGO AGUILAR-PACHECO, CESAR ALVARADO – same as those pertaining to Counts 8, 10, 11, and 13
2. JEFFREY MCCOY, ANTHONY BROWN, a/k/a "Ant Man," DESHAWNTE GAMBOA, DEBORAH POLK – same as those pertaining to Counts 2, 6, 7, 9, 12, 14, 15, and 17
3. JOSE DELGADILLO, a/k/a "Tepa" – same as those pertaining to Counts 3, 4, 5, and 18

CR19 0226

RS

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED

See attachment

- ☐
- Petty
-
- ☐
- Minor
-
- ☐
- Misdemeanor
-
- ☒
- Felony

PENALTY: See attachment

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

DEFENDANT - U.S.

➤ LUIS TORRES-GARCIA, a/k/a "Guero"

DISTRICT COURT NUMBER

None

CR19**0226****DEFENDANT****PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

DEA

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSE
SHOW
DOCKET NO.
☐ this prosecution relates to a pending case involving this same defendant
MAGISTRATE
CASE NO.
☒ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

3-19-70657

Name and Office of Person

Furnishing Information on this form AUSA Ryan Rezaei

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

Casey Boome/Ryan Rezaei

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

 1) ☒ If not detained give date any prior summons was served on above charges ➤
2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)**IS IN CUSTODY**4) ☐ On this charge5) ☐ On another conviction
☐ Federal ☐ State
6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF
ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted
ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☐ SUMMONS ☐ NO PROCESS* ☒ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

PENALTY SHEET

The defendants are charged as follows:

CR19 : 0226

RS

1. LORENZO LEE, a/k/a "O.G."

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

2. JEFFREY MCCOY

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 2: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 3: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 5: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 6: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

3. ANTHONY BROWN, a/k/a "Ant Man"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

4. DESHAWNTE GAMBOA

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C §§ 841(a)(1) and (b)(1)(B))

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5. DEBORAH POLK

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 16: Maintaining Drug-Involved Premises (21 U.S.C. § 856(a)(2))

RS

6. EVAN MARTINEZ-DIAZ

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

7. MAGO AGUILAR-PACHECO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

8. CESAR ALVARADO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 11: Possession with Intent to Distribute Five Kilograms and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 12: Possession with Intent to Distribute 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and

Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

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9. JESSE LOPEZ, III

Count 8: Possession with Intent to Distribute 400 Grams and More of a Mixture and Substance Containing a Detectable Amount of Fentanyl (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

10. JOSE DELGADILLO, a/k/a "Tepa"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

11. MARCO DELGADILLO, a/k/a "Tonio"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

12. LUIS TORRES-GARCIA, a/k/a "Guero"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

13. TIMOTHY PEOPLES, a/k/a "Tee"

Count 17: Possession with Intent to Distribute 28 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 18: Possession with Intent to Distribute Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Penalties associated with Counts 8, 10, 11, and 13 are as follows (A-weight drugs):

1. Imprisonment: Not less than 10 years but up to life
2. Fine: \$10 million
3. Supervised Release: Not less than 5 years but up to life
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

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Penalties associated with Counts 2, 6, 7, 9, 12, 14, 15, and 17 are as follows (B-weight drugs):

1. Imprisonment: Not less than 5 years and not more than 40 years
2. Fine: \$5 million
3. Supervised Release: Not less than 4 years but up to life
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

Penalties associated with Counts 3, 4, 5, and 18 are as follows (C-weight drugs):

1. Imprisonment: Not more than 20 years
2. Fine: \$1 million
3. Supervised Release: Not less than 3 years but up to life
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

Penalties associated with Count 16 (Maintaining Drug-Involved Premises)

1. Imprisonment: Not more than 20 years
2. Fine: \$500,000
3. Supervised Release: Not more than 3 years
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

Penalties associated with Count 1 for Various Defendants (Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances) (Various Weights)

1. LORENZO LEE, a/k/a "O.G.," EVAN MARTINEZ-DIAZ, MAGO AGUILAR-PACHECO, CESAR ALVARADO – same as those pertaining to Counts 8, 10, 11, and 13
2. JEFFREY MCCOY, ANTHONY BROWN, a/k/a "Ant Man," DESHAWNTE GAMBOA, DEBORAH POLK – same as those pertaining to Counts 2, 6, 7, 9, 12, 14, 15, and 17
3. JOSE DELGADILLO, a/k/a "Tepa" – same as those pertaining to Counts 3, 4, 5, and 18

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AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED

See attachment

- ☐
- Petty
-
- ☐
- Minor
-
- ☐
- Misdemeanor
-
- ☒
- Felony

PENALTY: See attachment

Name of District Court, and/or Judge/Magistrate Location

 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION
DEFENDANT - U.S.

TIMOTHY PEOPLES, a/k/a "Tee"

DISTRICT COURT NUMBER

 None **CR19 0226**
PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

DEA

- ☒
- person is awaiting trial in another Federal or State Court, give name of court

Northern District of California

- ☐
- this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

- ☐
- this is a reprosecution of charges previously dismissed which were dismissed on motion of:

☐ U.S. ATTORNEY ☐ DEFENSE

SHOW DOCKET NO.

- ☐
- this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

- ☒
- prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

3-19-70662

Name and Office of Person

Furnishing Information on this form AUSA Ryan Rezaei

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

Casey Boome/Ryan Rezaei

DEFENDANT**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

- 1)
- ☐
- If not detained give date any prior summons was served on above charges

- 2)
- ☐
- Is a Fugitive

- 3)
- ☒
- Is on Bail or Release from (show District)

Northern District of California

IS IN CUSTODY

- 4)
- ☐
- On this charge

- 5)
- ☐
- On another conviction

☐ Federal ☐ State

- 6)
- ☐
- Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted
ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☐ SUMMONS ☒ NO PROCESS* ☐ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

PENALTY SHEET

The defendants are charged as follows:

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RS

1. LORENZO LEE, a/k/a "O.G."

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 4: Distribution of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

2. JEFFREY MCCOY

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 2: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

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Count 5: Distribution of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 6: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

3. ANTHONY BROWN, a/k/a "Ant Man"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 7: Distribution of 28 Grams and More of a Mixture and Substance Containing Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

4. DESHAWNTE GAMBOA

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 9: Distribution of 100 Grams and More of a Mixture and Substance Containing Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

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5. DEBORAH POLK

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

Count 15: Possession with Intent to Distribute Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 16: Maintaining Drug-Involved Premises (21 U.S.C. § 856(a)(2))

6. EVAN MARTINEZ-DIAZ

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 13: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

7. MAGO AGUILAR-PACHECO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(B))

8. CESAR ALVARADO

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C §§ 846 and 841(a)(1) and (b)(1)(A))

Count 11: Possession with Intent to Distribute Five Kilograms and More of a Mixture and Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

Count 12: Possession with Intent to Distribute 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

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Count 14: Possession with Intent to Distribute 500 Grams and More of a Mixture and

Substance Containing a Detectable Amount of Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

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Count 8: Possession with Intent to Distribute 400 Grams and More of a Mixture and Substance Containing a Detectable Amount of Fentanyl (21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

RS

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10. JOSE DELGADILLO, a/k/a "Tepa"

Count 1: Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

11. MARCO DELGADILLO, a/k/a "Tonio"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

12. LUIS TORRES-GARCIA, a/k/a "Guero"

Count 10: Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

13. TIMOTHY PEOPLES, a/k/a "Tee"

Count 17: Possession with Intent to Distribute 28 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine Base (21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

Count 18: Possession with Intent to Distribute Cocaine (21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

Penalties associated with Counts 8, 10, 11, and 13 are as follows (A-weight drugs):

1. Imprisonment: Not less than 10 years but up to life
2. Fine: \$10 million
3. Supervised Release: Not less than 5 years but up to life
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

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Penalties associated with Counts 2, 6, 7, 9, 12, 14, 15, and 17 are as follows (B-weight drugs):

1. Imprisonment: Not less than 5 years and not more than 40 years
2. Fine: \$5 million
3. Supervised Release: Not less than 4 years but up to life
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

RS

Penalties associated with Counts 3, 4, 5, and 18 are as follows (C-weight drugs):

1. Imprisonment: Not more than 20 years
2. Fine: \$1 million
3. Supervised Release: Not less than 3 years but up to life
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

Penalties associated with Count 16 (Maintaining Drug-Involved Premises)

1. Imprisonment: Not more than 20 years
2. Fine: \$500,000
3. Supervised Release: Not more than 3 years
4. Special Assessment: \$100
5. Denial of Federal Benefits
6. Immigration Consequences Including Possible Deportation
7. Forfeiture

Penalties associated with Count 1 for Various Defendants (Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances) (Various Weights)

1. LORENZO LEE, a/k/a "O.G.," EVAN MARTINEZ-DIAZ, MAGO AGUILAR-PACHECO, CESAR ALVARADO – same as those pertaining to Counts 8, 10, 11, and 13
2. JEFFREY MCCOY, ANTHONY BROWN, a/k/a "Annie Man," DESHAUN NICHOLS, GAMBOA, DEBORAH POLK – same as those pertaining to Counts 2, 6, 7, 9, 12, 14, 15, and 17
3. JOSE DELGADILLO, a/k/a "Tepa" – same as those pertaining to Counts 3, 4, 5, and 18

United States District Court

NORTHERN DISTRICT OF CALIFORNIA

FILED

MAY 14 2019

INDICTMENT

U.S. v. LORENZO LEE a/k/a "O.G.", et al.

SUSAN Y. SCONG
CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA

DEFENDANTS' CONTINUATION LIST

(Page 1 of 1)

UNITED STATES OF AMERICA,

RS

Plaintiff,

CR19

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v.

JEFFREY MCCOY,
ANTHONY BROWN,
a/k/a "Ant Man,"
DESHAWNTE GAMBOA,
DEBORAH POLK,
EVAN MARTINEZ-DIAZ,
MAGO AGUILAR-PACHECO,
CESAR ALVARADO,
JESSE LOPEZ, III,
JOSE DELGADILLO,
a/k/a "Tepa,"
MARCO DELGADILLO,
a/k/a "Tonio,"
LUIS TORRES-GARCIA,
a/k/a "Guero," and
TIMOTHY PEOPLES,
a/k/a "Tee,"

DAVID L. ANDERSON (CABN 149604)
United States Attorney

FILED

MAY 14 2019

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

RS

SAN FRANCISCO DIVISION

CR19

0226

UNITED STATES OF AMERICA,

Plaintiff,

v.

LORENZO LEE,
a/k/a "O.G.,"
JEFFREY MCCOY,
ANTHONY BROWN,
a/k/a "Ant Man,"
DESHAWNTE GAMBOA,
DEBORAH POLK,
EVAN MARTINEZ-DIAZ,
MAGO AGUILAR-PACHECO,
CESAR ALVARADO,
JESSE LOPEZ, III,
JOSE DELGADILLO,
a/k/a "Tepa,"
MARCO DELGADILLO,
a/k/a "Tonio,"
LUIS TORRES-GARCIA,
a/k/a "Guero," and
TIMOTHY PEOPLES,
a/k/a "Tee,"

Defendants.

CASE NO.

VIOLATIONS:

21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to
Distribute and Possess with Intent to Distribute
Controlled Substances (Two Counts);
21 U.S.C. § 841(a)(1) – Distribution of Controlled
Substances (Seven Counts);
21 U.S.C. § 841(a)(1) – Possession with Intent to
Distribute Controlled Substances (Eight Counts);
21 U.S.C. § 856(a)(2) – Maintaining Drug-Involved
Premises;
18 U.S.C. § 2 – Aiding and Abetting;
21 U.S.C. § 853 – Forfeiture Allegation

SAN FRANCISCO DIVISION

INDICTMENT

INDICTMENT

COUNT ONE: (21 U.S.C. §§ 846 and 841(a)(1) – Conspiracy to Distribute and Possess with Intent to Distribute Cocaine, Cocaine Base, Heroin, Fentanyl, and Methamphetamine)

Beginning on or about August 30, 2017, and continuing to on or about April 30, 2019, in the Northern District of California and elsewhere, the defendants,

LORENZO LEE,
a/k/a “O.G.,”
JEFFREY MCCOY,
ANTHONY BROWN,
a/k/a “Ant Man,”
DESHAWNTE GAMBOA,
DEBORAH POLK,
EVAN MARTINEZ-DIAZ,
MAGO AGUILAR-PACHECO,
CESAR ALVARADO,
and
JOSE DELGADILLO,
a/k/a “Tepa,”

and others known and unknown to the Grand Jury, did knowingly and intentionally conspire to distribute and possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of its isomers, a Schedule II controlled substance, a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, a mixture and substance containing a detectable amount of fentanyl, a Schedule IV controlled substance, and methamphetamine, its salts, isomers and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1).

With respect to LORENZO LEE, a/k/a “O.G.,” his conduct as a member of the conspiracy, which includes the reasonably foreseeable conduct of other members of the conspiracy, involved 28 grams and more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B), 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B), 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United

1 States Code, Sections 841(a)(1) and (b)(1)(A), and 500 grams and more of a mixture and substance
2 containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of its
3 isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections
4 841(a)(1) and (b)(1)(B).

5 With respect to JEFFREY MCCOY, his conduct as a member of the conspiracy, which includes
6 the reasonably foreseeable conduct of other members of the conspiracy, involved 28 grams and more of
7 a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled
8 substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B), and 100 grams
9 and more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled
10 substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

11 With respect to ANTHONY BROWN, a/k/a "Ant Man," his conduct as a member of the
12 conspiracy, which includes the reasonably foreseeable conduct of other members of the conspiracy,
13 involved 28 grams and more of a mixture and substance containing a detectable amount of cocaine base,
14 a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and
15 (b)(1)(B).

16 With respect to DESHAWNTE GAMBOA, his conduct as a member of the conspiracy, which
17 includes the reasonably foreseeable conduct of other members of the conspiracy, involved 100 grams
18 and more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled
19 substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

20 With respect to EVAN MARTINEZ-DIAZ, his conduct as a member of the conspiracy, which
21 includes the reasonably foreseeable conduct of other members of the conspiracy, involved 500 grams
22 and more of a mixture and substance containing a detectable amount of methamphetamine, its salts,
23 isomers and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United
24 States Code, Sections 841(a)(1) and (b)(1)(A), and 500 grams and more of a mixture and substance
25 containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of its
26 isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections
27 841(a)(1) and (b)(1)(B).

28 With respect to MAGO AGUILAR-PACHECO, his conduct as a member of the conspiracy,

1 which includes the reasonably foreseeable conduct of other members of the conspiracy, involved 500
 2 grams and more of a mixture and substance containing a detectable amount of cocaine, its salts, optical
 3 and geometric isomers, and salts of its isomers, a Schedule II controlled substance, in violation of Title
 4 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

5 With respect to CESAR ALVARADO, his conduct as a member of the conspiracy, which
 6 includes the reasonably foreseeable conduct of other members of the conspiracy, involved five
 7 kilograms and more of a mixture and substance containing a detectable amount of cocaine, its salts,
 8 optical and geometric isomers, and salts of its isomers, a Schedule II controlled substance, in violation
 9 of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A), 100 grams and more of a mixture and
 10 substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of
 11 Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B), and 500 grams and more of a mixture
 12 and substance containing a detectable amount of methamphetamine, its salts, isomers and salts of its
 13 isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections
 14 841(a)(1) and (b)(1)(A).

15 With respect to DEBORAH POLK, her conduct as a member of the conspiracy, which includes
 16 the reasonably foreseeable conduct of other members of the conspiracy, involved 100 grams and more of
 17 a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in
 18 violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

19 COUNT TWO: (21 U.S.C. §§ 841(a)(1) and (b)(1)(B) – Distribution of 28 Grams and More of a
 20 Mixture and Substance Containing Cocaine Base)

21 On or about September 6, 2017, in the Northern District of California, the defendant,
 22 JEFFREY MCCOY,
 23 did knowingly and intentionally distribute 28 grams and more of a mixture and substance containing a
 24 detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United
 25 States Code, Sections 841(a)(1) and (b)(1)(B).

26 COUNT THREE: (21 U.S.C. §§ 841(a)(1) and (b)(1)(C) – Distribution of Heroin)

27 On or about September 28, 2017, in the Northern District of California, the defendant,
 28 JEFFREY MCCOY,

1 did knowingly and intentionally distribute a mixture and substance containing a detectable amount of
 2 heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections
 3 841(a)(1) and (b)(1)(C).

4 COUNT FOUR: (21 U.S.C. §§ 841(a)(1) and (b)(1)(C) – Distribution of Cocaine)

5 On or about November 2, 2017, in the Northern District of California, the defendants,

6 JEFFREY MCCOY,
 7 and
 8 LORENZO LEE,
 a/k/a "O.G.,"

9 did knowingly and intentionally distribute a mixture and substance containing a detectable amount of
 10 cocaine, its salts, optical and geometric isomers, and salts of its isomers, a Schedule II controlled
 11 substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18,
 12 United States Code, Section 2.

13 COUNT FIVE: (21 U.S.C. §§ 841(a)(1) and (b)(1)(C) – Distribution of Heroin)

14 On or about December 7, 2017, in the Northern District of California, the defendant,

15 JEFFREY MCCOY,

16 did knowingly and intentionally distribute a mixture and substance containing a detectable amount of
 17 heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections
 18 841(a)(1) and (b)(1)(C).

19 COUNT SIX: (21 U.S.C. §§ 841(a)(1) and (b)(1)(B) – Distribution of 28 Grams and More of a
 20 Mixture and Substance Containing Cocaine Base)

21 On or about January 11, 2018, in the Northern District of California, the defendant,

22 JEFFREY MCCOY,

23 did knowingly and intentionally distribute 28 grams and more of a mixture and substance containing a
 24 detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United
 25 States Code, Sections 841(a)(1) and (b)(1)(B).

26 COUNT SEVEN: (21 U.S.C. §§ 841(a)(1) and (b)(1)(B) – Distribution of 28 Grams and More of a
 27 Mixture and Substance Containing Cocaine Base)

28 On or about April 27, 2018, in the Northern District of California, the defendants,

JEFFREY MCCOY,
LORENZO LEE,
a/k/a "O.G.,"
and
ANTHONY BROWN,
a/k/a "Ant Man,"

did knowingly and intentionally distribute 28 grams and more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B) and Title 18, United States Code, Section 2.

COUNT EIGHT: (21 U.S.C. §§ 841(a)(1) and (b)(1)(A) – Possession with Intent to Distribute 400 Grams and More of a Mixture and Substance Containing a Detectable Amount of Fentanyl)

On or about May 15, 2018, in the Northern District of California, the defendant,

JESSE LOPEZ, III,

did knowingly and intentionally possess with intent to distribute 400 grams and more of a mixture and substance containing a detectable amount of fentanyl, a Schedule IV controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

COUNT NINE: (21 U.S.C. §§ 841(a)(1) and (b)(1)(B) – Distribution of 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin)

On or about August 13, 2018, in the Northern District of California, the defendants,

JEFFREY MCCOY,
and
DESHAWNTE GAMBOA,

did knowingly and intentionally distribute 100 grams and more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B) and Title 18, United States Code, Section 2.

COUNT TEN: (21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A) – Conspiracy to Distribute and Possess with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine)

Beginning on or about May 5, 2018, and continuing to on or about February 17, 2019, in the Northern District of California and elsewhere, the defendants,

JOSE DELGADILLO,
a/k/a "Tepa,"
MARCO DELGADILLO,
a/k/a "Tonio,"

and
 LUIS TORRES-GARCIA,
 a/k/a "Guero,"

and others known and unknown to the Grand Jury, did knowingly and intentionally conspire to distribute and possess with the intent to distribute 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine, its salts, isomers and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1), and (b)(1)(A).

COUNT ELEVEN: (21 U.S.C. §§ 841(a)(1) and (b)(1)(A) – Possession with Intent to Distribute Five Kilograms and More of a Mixture and Substance Containing a Detectable Amount of Cocaine)

On or about February 9, 2019, in the Northern District of California, the defendant,

CESAR ALVARADO,

did knowingly and intentionally possess with intent to distribute five kilograms and more of a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

COUNT TWELVE: (21 U.S.C. §§ 841(a)(1) and (b)(1)(B) – Possession with Intent to Distribute 100 Grams and More of a Mixture and Substance Containing a Detectable Amount of Heroin)

On or about February 9, 2019, in the Northern District of California, the defendant,

CESAR ALVARADO,

did knowingly and intentionally possess with intent to distribute 100 grams and more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT THIRTEEN: (21 U.S.C. §§ 841(a)(1) and (b)(1)(A) – Possession with Intent to Distribute 500 Grams and More of a Mixture and Substance Containing a Detectable Amount of Methamphetamine)

On or about February 9, 2019, in the Northern District of California, the defendants,

LORENZO LEE,
 a/k/a "O.G.,"
 CESAR ALVARADO,
 and
 EVAN MARTINEZ-DIAZ,

1 did knowingly and intentionally possess with intent to distribute 500 grams and more of a mixture and
 2 substance containing a detectable amount of methamphetamine, its salts, isomers and salts of its
 3 isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections
 4 841(a)(1) and (b)(1)(A) and Title 18, United States Code, Section 2.

5 COUNT FOURTEEN: (21 U.S.C. §§ 841(a)(1) and (b)(1)(B) – Possession with Intent to
 6 Distribute 500 Grams and More of a Mixture and Substance Containing a
 Detectable Amount of Cocaine)

7 On or about February 9, 2019, in the Northern District of California, the defendants,

8 LORENZO LEE,
 a/k/a “O.G.”
 9 CESAR ALVARADO,
 and
 10 EVAN MARTINEZ-DIAZ,

11 did knowingly and intentionally possess with intent to distribute 500 grams and more of a mixture and
 12 substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts
 13 of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections
 14 841(a)(1) and (b)(1)(B) and Title 18, United States Code, Section 2.

15 COUNT FIFTEEN: (21 U.S.C. §§ 841(a)(1) and (b)(1)(B) – Possession with Intent to
 16 Distribute Heroin)

17 On or about April 30, 2019, in the Northern District of California, the defendants,

18 LORENZO LEE,
 a/k/a “O.G.”
 and
 19 DEBORAH POLK,

20 did knowingly and intentionally possess with intent to distribute 100 grams and more of a mixture and
 21 substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of
 22 Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B) and Title 18, United States Code, Section
 23 2.

24 COUNT SIXTEEN: (21 U.S.C. § 856(a)(2) – Maintaining Drug-Involved Premises)

25 On or about April 30, 2019, in the Northern District of California, the defendant,

26 DEBORAH POLK,

27 did unlawfully, knowingly and intentionally manage and control a house at 3412 Serpentine Dr.,
 28 Antioch, California, as an owner, lessee, agent, employee, occupant, and mortgagee, and made available

for use, with or without compensation, said place for the purpose of unlawfully manufacturing, storing, and distributing a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 856(a)(2).

COUNT SEVENTEEN: (21 U.S.C. §§ 841(a)(1) and (b)(1)(B) – Possession with Intent to Distribute 28 Grams and More of a Mixture and Substance Containing a Detectable Amount of Cocaine Base)

On or about April 30, 2019, in the Northern District of California, the defendant,

TIMOTHY PEOPLES,
a/k/a “Tee,”

did knowingly and intentionally possess with intent to distribute 28 grams and more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT EIGHTEEN: (21 U.S.C. §§ 841(a)(1) and (b)(1)(C) – Possession with Intent to Distribute Cocaine)

On or about April 30, 2019, in the Northern District of California, the defendant,

TIMOTHY PEOPLES,
a/k/a “Tee,”

did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

FORFEITURE ALLEGATION: (21 U.S.C. § 853(a))

The allegations contained above are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853(a).

Upon conviction of any of the offenses set forth in this Indictment, the defendants,

LORENZO LEE,
a/k/a “O.G.,”
JEFFREY MCCOY,
ANTHONY BROWN,
a/k/a “Ant Man,”
DESHAWNTE GAMBOA,
DEBORAH POLK,
EVAN MARTINEZ-DIAZ,

MAGO AGUILAR-PACHECO,
CESAR ALVARADO,
JESSE LOPEZ, III,
JOSE DELGADILLO,
a/k/a "Tepa,"
MARCO DELGADILLO,
a/k/a "Tonio,"
LUIS TORRES-GARCIA,
a/k/a "Guero,"
and
TIMOTHY PEOPLES,
a/k/a "Tee,"

shall forfeit to the United States all right, title, and interest in any property constituting and derived from any proceeds defendant obtained, directly or indirectly, as a result of such violations, and any property used, or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations.

If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

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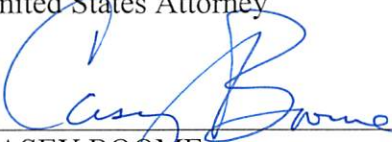
1 All pursuant to Title 21, United States Code, Section 853, and Federal Rule of Criminal
2 Procedure 32.2.

3 DATED: *MAY 14, 2019*

A TRUE BILL.

4
5 
6 FOREPERSON

7 DAVID L. ANDERSON
8 United States Attorney

9 
10 CASEY BOOME
11 Assistant United States Attorney